

**EXHIBIT D**

**SAVIANO, P.C.**  
51 East 42<sup>nd</sup> Street  
11<sup>th</sup> Floor  
New York, New York 10017  
Tel. (212) 532-7650 Fax (212) 532-7651

Edward S. Saviano, Esq. \*  
Elaine M. Yuen, Esq. +

\* ADMITTED IN NY, NJ, FL & PA  
+ ADMITTED IN NY & NJ

savvyllaw

esaviano@savvyllaw.com  
eyuen@savvyllaw.com

September 27, 2013

Gary M. Kushner, Esq.  
Goetz Fitzpatrick LLP  
One Penn Plaza  
New York, NY 10119

Re: OTR Media Group, Inc.  
Subpoena in Adv. Pro. 11-01448 (ESS)

Dear Mr. Kushner:

Please be advised that we are counsel for Edward F. Arrigoni, the person to whom you directed a subpoena in the above referenced proceeding.

Please be advised further that the subpoena was improperly served because it was sent by Federal Express, and therefore is null and void. On behalf of Mr. Arrigoni, we fully reserve all other objections as to the subpoena, including as to whether he is a proper witness in your proceeding.

Furthermore, we know of no reason why anyone would seek to depose our client in connection with the above referenced proceeding. Without prejudice to or waiver of any of our client's rights or claims, all of which are fully reserved, to save unnecessary legal costs and expense, and avoid motion practice, we suggest you call us if you believe there is any proper grounds for attempting to subpoena our client.

Very truly yours,



Edward S. Saviano